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Attorneys for Defendants Target Corporation
and Target Stores, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Kathleen Albert,

Plaintiff,

v.

Target Corporation, a foreign corporation;
Target Stores, Inc., a foreign corporation;
ABC Partnerships I through X; and Black
Corporations I through X,

Defendants.

No.

NOTICE OF REMOVAL

Defendants Target Corporation and Target Stores, Inc., by and through undersigned counsel, file this Notice of Removal of this action to the United States District Court for the District of Arizona and states as follows:

1. On or about October 3, 2021, this action was commenced against Defendants in the Superior Court of the State of Arizona, in and for the County of Maricopa under the caption *Kathleen Albert v. Target Corporation, et al.* Copies of the initial pleadings are attached hereto as Exhibit A. Defendant was served by process on October 15, 2021.

2. Target Corporation and Target Stores, Inc. are Minnesota corporations with their principal place of business in Minneapolis, Minnesota. According to the Complaint, Plaintiff is a resident and citizen of Maricopa County, Arizona. This Court has original jurisdiction over the civil action pursuant to 28 U.S.C. § 1332 in that the matter in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs,

1 and the action is between citizens of different states. Plaintiff's Complaint does not specify
2 precise damages claimed, however, Plaintiff is claiming medical specials in the amount of
3 \$43,821.37, not including allegations of future medical care and associated costs. Further,
4 Plaintiff's counsel confirmed on March 21, 2022 that the amount in controversy exceeded
5 \$75,000. Based upon this information, the amount in controversy exceeds the
6 jurisdictional limits for diversity jurisdiction. Therefore, this action may be removed to
7 this Court pursuant to the provisions of 28 U.S.C. § 1441, et seq.

8 4. Written notice of the filing of this Notice of Removal will be given to
9 all adverse parties as required by law and a true and correct copy of this Notice will be filed
10 with the Clerk of the Superior Court of the State of Arizona, in and for the County of
11 Maricopa.

12 5. A Notice of Filing Notice of Removal was filed with the Superior
13 Court and a copy of the same is attached as Exhibit B.

14 WHEREFORE, Defendants respectfully request that this action be removed
15 to this Court.

16 DATED this 14th day of April, 2022.

17 JONES, SKELTON & HOCHULI, P.L.C.

18
19 By /s/ Jefferson T. Collins

20 Jefferson T. Collins
21 40 N. Central Avenue, Suite 2700
22 Phoenix, Arizona 85004
23 Attorneys for Defendants Target
24 Corporation and Target Stores, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2022, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Kathy Kleinschmidt